



BOULT • CUMMINGS  
CONNERS • BERRY<sup>PLC</sup>

Henry Walker  
(615) 252-2363  
Fax (615) 252-6363  
Email hwalker@boultcummings.com

December 8, 2003

Hon. Deborah Taylor Tate  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN

Re: Implementation of the Federal Communications Commission's Triennial  
Review Order (Nine-month Proceeding) (Loop & Transport) and  
(Switching)  
Docket No. 03-00491 and Docket 03-00527

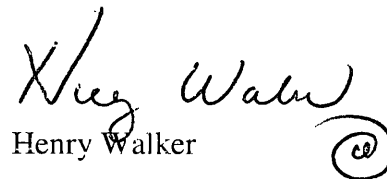
Dear Chairman Tate:

This letter is to confirm that the responses to discovery filed by Xspedius in the above-captioned proceedings are revised responses filed at the Florida Public Service Commission in Dockets 030851-TP (Switching) and 030852-TP (Loop and Transport). These are region wide responses.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

  
Henry Walker

HW/pp

RECEIVED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2003 DEC 10 PM 2:24

T.R.A. DCKET ROOM

In Re: Implementation of Requirements )  
Arising From Federal Communications )  
Commission Triennial UNE Review: )  
For DS1, DS3, and Dark Fiber Loops )  
And Route-Specific Review for DS1, DS3, )  
And Dark Fiber Transport )  
\_\_\_\_\_ )

Docket No.: 030852-TP

( 03-00527 /

Filed: December 8, 2003

**REVISED RESPONSES AND OBJECTIONS OF  
XSPEDIUS COMMUNICATIONS, LLC  
TO BELL SOUTH'S FIRST SET OF INTERROGATORIES (Nos. 1-13)**

Xspedius Communications, LLC, on behalf of its Florida operating affiliates, Xspedius Management Co. Switched Services, LLC and Xspedius Management Co. of Jacksonville, LLC (collectively "Xspedius"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 (hereinafter "*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, hereby provides these regionwide responses and objections to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to Xspedius, served on October 17, 2003, and, to the extent necessary, hereby moves the Florida Public Service Commission (hereinafter the "Commission") (and other commissions, as necessary) for a protective order. Pursuant to the separate agreement between BellSouth and Xspedius, Xspedius is providing its responses today and will provide to BellSouth certain confidential information, identified below, pursuant to the separate protective agreement of the parties. These responses revise the previously filed Florida responses of Xspedius Communications, LLC, which were Florida-specific, to provide regionwide responses. These responses are revised responses in Florida, but the first such responses provided to BellSouth in each of the other BellSouth states.

## **I. General Objections**

Xspedius makes the following revised regionwide General Objections to BellSouth's First Set of Interrogatories, including the applicable definitions therein ("BellSouth discovery"), which as appropriate will be incorporated into each relevant response when Xspedius' responses are served on BellSouth.

1. Xspedius objects to the BellSouth discovery to the extent that such discovery seeks to impose an obligation on Xspedius to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Xspedius further objects to any and all BellSouth discovery that seeks to obtain information from Xspedius for Xspedius subsidiaries, affiliates, or other related Xspedius entities that are not certificated by the Commission.

2. Xspedius has interpreted the BellSouth discovery to apply to Xspedius' regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any BellSouth discovery is intended to apply to matters that take place outside the state of Florida and which are not related to Florida intrastate operations subject to the jurisdiction of the Commission, Xspedius objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Xspedius objects to the BellSouth discovery to the extent that such discovery calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Xspedius objects to the BellSouth discovery insofar as such discovery is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations and are not properly defined or explained for purposes of these requests.

5. Xspedius objects to the BellSouth discovery insofar as such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. Xspedius objects to the BellSouth discovery insofar as it seeks information or documents, or seek to impose obligations on Xspedius which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. Xspedius objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, the FCC, is otherwise publicly available, or which is already in the possession, custody, or control of BellSouth.

8. Xspedius objects to the BellSouth discovery to the extent that such discovery is overly broad, unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Xspedius objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, Xspedius will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. Xspedius is a corporation with employees located in many different locations in Florida and in other states. In the course of its business, Xspedius creates countless documents

that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. Xspedius will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information. To the extent that the BellSouth discovery purports to require more, Xspedius objects on the grounds that compliance would impose an undue burden or expense.

11. Xspedius objects to the BellSouth discovery that seeks to obtain “all,” “each,” or “every” document, item, customer, or other such piece of information to the extent that such discovery is overly broad and unduly burdensome.

12. Xspedius objects to the BellSouth discovery to the extent such discovery seeks to have Xspedius create documents not in existence at the time of the request.

13. Xspedius objects to the BellSouth discovery as overly broad and unduly burdensome to the extent that such discovery is not limited to any stated period of time or a stated period of time that is longer than is relevant for purposes of the issues in this docket.

14. In light of the short period of time Xspedius has been afforded to respond to the BellSouth discovery, the development of Xspedius’ positions and potentially responsive information to the BellSouth requests is necessarily ongoing and continuing. This process is further complicated since at this point in time, the actual issues to be set forth for hearing in this docket have not yet been established by order of the Commission. Accordingly, these are preliminary objections to comply with the Commission’s September 22, 2003, order Xspedius reserves the right to supplement, revise, or modify its objections at the time that it serves its actual responses to the BellSouth discovery. However, Xspedius does not assume an affirmative

obligation to supplement its answers on an ongoing basis, contrary to the BellSouth General Instruction.

15. Xspedius objects to the BellSouth discovery to the extent that it seeks disclosure of facts known and opinions held by experts acquired and/or developed in anticipation of litigation or for hearing and outside the scope of discoverable information pursuant to Rule 1.280(4) of the Florida Rules of Civil Procedure.

16. Xspedius objects to the BellSouth discovery to the extent that the definitions operate to seek discovery of matters other than those subject to the jurisdiction of the Commission, pursuant to the FCC's Triennial Review Order, Florida Administrative Code, and Florida statutes.

17. Xspedius objects to the BellSouth discovery to the extent that it asks for information that may not be available in precisely the same format, category, or definitions from Xspedius systems, which systems are limited in terms of their capacity to produce unlimited reports and information in any format, category or definition requested.

## **II. Specific Objections**

Xspedius makes the following revised regionwide Specific Objections to the BellSouth discovery, which as appropriate will be incorporated into each relevant response when Xspedius' responses are served on BellSouth.

18. Xspedius objects to each and every interrogatory or request for production that seeks information regarding Xspedius' operations in ILEC service areas other than the BellSouth ILEC service area within the state of Florida as such information is irrelevant to BellSouth's case in this docket and such discovery is overly broad and unduly burdensome.

19. Xspedius objects to each and every interrogatory or request for production that seeks to obtain information regarding “former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Xspedius” as such information is not within Xspedius’ control, would be unduly burdensome to attempt to obtain and is likely irrelevant.

20. Outside of the discovery request served by BellSouth on October 17, 2003, there have been discussions between BellSouth and some of the CLECs that this discovery is “regional” in nature and that BellSouth would prefer that the CLECs respond on a regional basis without additional service in these other states. At this point in time, without necessarily agreeing or disagreeing with BellSouth’s request for regional answers, Xspedius reserves its rights to object to providing responsive information for states other than Florida. Further, in the event Xspedius does provide responsive information for states other than Florida pursuant to the October 17, 2003, discovery in this Florida docket, Xspedius reserves its rights to not provide such non-Florida information in the Florida FPSC case. Finally, in the event Xspedius does provide information for states other than Florida pursuant to the October 17, 2003, discovery in this Florida docket, Xspedius reserves its rights to provide such non-Florida information on a schedule other than that which is specified in the Florida PSC Procedural Order.

### **III. Regionwide Objections and Responses**

25. Xspedius makes the foregoing general and specific objections and provides the following responses to BellSouth’s First Set of Interrogatories and Request for Production of Documents regionwide in all states throughout the BellSouth region. Where Xspedius has already filed general or specific objections in Triennial Review proceedings in a particular state,

including but not limited to North Carolina or Tennessee, Xspedius hereby incorporates those general and specific objections.

26. To the extent the foregoing general or specific objections refer to "Florida", the Florida code, or Florida statutes, the same objection prevails in relation to the other BellSouth states.

### **INTERROGATORIES**

**INTERROGATORY 1.** Affirm or deny that you have self-provided high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 2 51 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

**XSPEDIUS RESPONSE:** Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: Xspedius denies that it has self-provided such facilities regionwide.

Response provided by: Objections provided by Counsel. Substantive response provided by Brian Butram, Director, Transmission Engineering, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366

**INTERROGATORY 2.** Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire-centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying

- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- 5.c. Whether you self-provide transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: see response to Interrogatory No. 1.

Response provided by: Objections provided by Counsel. Substantive response provided by Brian Butram, Director, Transmission Engineering, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 5.** For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- 5.c. Whether your wholesale transport facilities are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties; indicate the vendor name.

- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: see response to Interrogatory No. 2.

Response provided by: Objections provided by Counsel. Substantive response provided by Nancy Gaudin, Director, Product Marketing, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 6.** For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS!, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: see response to Interrogatory 3.

Response provided by: Objections provided by Counsel. Substantive response provided by Steve Van Valin, Director, Access Cost Management, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 7.** If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: see response to Interrogatories Nos. 4 and 5.

Response provided by: Objections provided by Counsel. Substantive response provided by Brian Butram and Nancy Gaudin, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 8.** Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (II) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: Xspedius affirms that it does provide such facilities in several states in the BellSouth region.

Response provided by: Objections provided by Counsel. Substantive response provided by Brian Butram, Director, Transmission Engineering, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 9.** Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3, or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8,

9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: Xspedius denies that it offers to carriers on a wholesale basis such facilities regionwide.

Response provided by: Objections provided by Counsel. Substantive response provided by Nancy Gaudin, Director, Product Marketing, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 10.** Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in this response.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: Xspedius has not obtained such loops regionwide.

Response provided by: Objections provided by Counsel. Substantive response provided by Steve Van Valin, Director, Access Cost Management, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 11.** Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in this response.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: Xspedius has not obtained such loops regionwide.

Response provided by: Objections provided by Counsel. Substantive response provided by Steve Van Valin, Director, Access Cost Management, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**INTERROGATORY 12.** For each state in Questions 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of

the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI).
- c. Indicate whether the facility is wholly owned by you (yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facilities is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). this includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intrabuilding wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: see response to Interrogatory No. 10. With respect to Interrogatory No. 8, Xspedius provides certain responsive confidential information on the attached Confidential document XSPEDIUS ALL-LOOP-INT-1(a) through (g) respectively.

Response provided by: Objections provided by Counsel. Substantive response provided by Brian Butram, Director, Network Transmission, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

**45-INTERROGATORY 13.** For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI)
- c. Indicate whether the facility is wholly owned by you (Yes or No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.

- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.

XSPEDIUS RESPONSE: Xspedius adopts and incorporates its General Objections 1, 2, 5, 6, 8, 9 and 16 and its Specific Objection 20, as if set forth herein verbatim. Subject to, and without waiving these objections, Xspedius states as follows: see responses to Interrogatories 9 and 11.

Response provided by: Objections provided by Counsel. Substantive response provided by Nancy Gaudin and Karen Crabtree, Xspedius Communications, 5555 Winghaven Blvd., O'Fallon, MO 63366.

Respectfully submitted this 8<sup>th</sup> day of December, 2003.

---

Norman H. Horton, Jr.  
Messer, Caparello & Self, P.A.  
215 S. Monroe Street, Suite 701  
Tallahassee, FL 32302  
(850) 222-0720

Attorneys for Xspedius Communications, LLC

### CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2003, a copy of the foregoing document was serviced on the parties of record, via US mail:

Guy Hicks  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201

Charles B. Welch, Esquire  
Farris, Mathews, et. Al  
618 Church St., #300  
Nashville, TN 37219

Timothy Phillips, Esquire  
Office of Tennessee Attorney General  
P. O. Box 20207  
Nashville, Tennessee 37202

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave., N. #320  
Nashville, TN 37219-1823

James Wright, Esquire  
United Telephone – Southeast  
14111 Capital Blvd.  
Wake Forest, NC 27587

Martha M. Ross-Bain, Esq.  
AT&T Communications of the  
South Central States, LLC  
1200 Peachtree Street, Suite 8100  
Atlanta, GA 30309

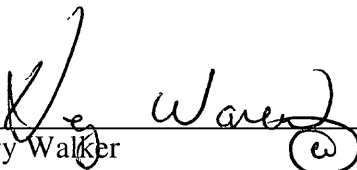
Ms. Carol Kuhnow  
Qwest Communications, Inc.  
4250 N. Fairfax Dr.  
Arlington, VA 22203

Jon E. Hastings, Esq.  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

Dale Grimes, Esq.  
Bass, Berry & Sims  
315 Deaderick St., #2700  
Nashville, TN 37238-3001

Mark W. Smith, Esq.  
Strang, Fletcher, et al.  
One Union Square, #400  
Chattanooga, TN 37402

Nanette S. Edwards, Esq.  
ITC^DeltaCom  
4092 South Memorial Parkway  
Huntsville, AL 35802

  
\_\_\_\_\_  
Henry Walker